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July 16, 2014

Via ECF

Hon. Vincent L. Briccetti
United States District Judge
United States Courthouse
300 Quarropas Street, Room 630
White Plains, NY 10601

Re: *Goldstein, et al. v. Solucorp, et al.*
Case No. 7:11-cv-06227-VB

Dear Judge Briccetti:

We represent Plaintiffs in this matter, and write in response to the letter Mr. Condon sent to the court today. As the court is aware, this case has been pending since 2011. In late 2013, on the eve of party depositions commencing, Mr. Condon made a motion to withdraw as counsel for certain of the defendants, which the court granted over Plaintiffs' objection. Now, as we are again on the eve of depositions commencing, Mr. Condon writes to the court asking for a further stay in order for him to move to withdraw as counsel for some of the defendants he still represents (although, apparently, he intends to continue to represent Defendant Peter Mantia). Under the current scheduling order, fact discovery must be completed by July 29, 2014. Between now and that cut-off, we have scheduled a number of depositions, including Mr. Goldstein, the defendants, and a non-party witness.

Although we are sympathetic to Mr. Condon's concerns, all parties are entitled to a fair and timely resolution of this matter. Plaintiffs oppose any further stays of discovery.

Respectfully,

A handwritten signature in black ink, appearing to read 'R. Lash', written over a horizontal line.

Robert L. Lash

Cc: All Counsel of Record

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